

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE
ANDRE BISASOR, Plaintiff,
v. CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC; UPTON &
HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**EMERGENCY MOTION OF URGENT CLARIFICATION AND REQUEST FOR
CORRECTION**

1. I am writing urgently to inform the court that I saw the order this morning on the confidential sealed motion for reasonable accommodations where the court, in part said "**With respect to the information concerning Bisasor's medical conditions, Bisasor averred that he previously sought defendants' concurrence "on this motion or matters related to this motion in more general terms," thus indicating that he already revealed at least some of the facts underlying his motion to the defendants. Accordingly, sealing this portion at Level I is appropriate".**
2. This is not correct. I have not shared any medical conditions in the sealed motion for reasonable accommodations, with the defendants. My reference about concurrence was generally about the relief requested in terms of the extension request in the past, that were filed publicly and was opposed, as well as the motion for reasonable accommodation filed publicly in the fall of 2023, none of which contained medical information. I also recently, before filing the most recent motion for reasonable accommodation, emailed the defendants a list of motions with titles only (no content) and asked if they concur and they did not. One of those motions listed was concerning my intent to seek further reasonable accommodation but again only had the title, with no content reference and certainly no medical information.
3. I also inadvertently carried over language from a prior motion filed previously (on another matter) that was copied inartfully into this sealed motion for reasonable accommodation, in stating the point about concurrence, which from what I recall was shortly following the clerk's notice on another matter, that stated that statements of concurrence are to be included in any motion. I mistakenly took this to mean that I should try to include some statement about concurrence even on sealed motions. I now realize that this is not so.

4. Therefore, the bottom line is that I have not shared any medical information with the defendants. This has been true for all of my confidential sealed motions filed in this court containing medical information.
5. I also reiterated this point to one extent or another during the status conference on 4/23/24 where I clearly was avoiding sharing any medical information with the defendants even during the sealed portion of the hearing.
6. I am unclear why the court would overlook all of that indicia to somehow draw the strained conclusion that despite all of my careful attempts to protect such information from the defendants, that I had in fact shared such confidential medical information with the defendants. This is an unnatural interpretation of the facts and circumstances and of even the words are I actually used in the brief limited statement of concurrence at the end of the motion.
7. Any sharing with the defendants of this info would be to my prejudice. I want to reiterate that I do not want to share any confidential medical information with the defendants. Otherwise, if I am in any danger of such confidential information being shared with the defendants, I would rather withdraw the motion as per the rules, because I never expected that this information would be shared at all, as per the rules.
8. I do not want any motion confidential medical information to be sealed at Level I, but only at Level II. That was my clear intent when I filed the Level II sealed motion. Again, I have to be able to rely on the court adhering to the rules.
9. Can you please correct this part of the order and correct the part where I am to refile the motion with my medical information to be sealed at Level II?
10. Please rule on this urgently because it is not clear to me if the court intends the clerk to immediately unseal the motion or parts of the motion without my further action.
11. Also, I would like to ask for clarification, per the court's most recent order today, on whether the court is ordering that I not email the clerk for anything at all including to seek procedure information or court information, as a pro se party?
12. I do not have time to seek or await concurrence from the defendants given the exigency of the matter. NB: I also copied the defendants on email to the court with essentially same text as written above.

13. Please grant a pro se liberal construction to this pleading.
14. Please grant my request or grant any other relief the Court deems proper.

Respectfully submitted,
/s/ Andre Bisasor
Andre Bisasor

April 25, 2024

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served to the defendants in this case.

/s/ Andre Bisasor
Andre Bisasor